

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf of themselves and all other similarly situated,

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND
ORDER FOR APPOINTMENT OF A
SPECIAL MASTER

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

No. 2:21-cv-00693-JHC

Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation.

Defendant

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

No. 2:22-cv-00965-JHC

Plaintiffs.

V.

AMAZON.COM, INC., a Delaware corporation.

Defendant

The Parties submit this Proposed Order pursuant to the Court's Order selecting a Special Master, establishing the Special Master's authority, and establishing a protocol for raising privilege disputes. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220. Accordingly, the Parties, and their respective counsel, hereby stipulate and agree, and request an order establishing the following:

1. The Court APPOINTS the Honorable Elizabeth D. Laport (Ret.) as the Special Master in these matters.
2. The Special Master will file a declaration under 28 U.S.C. § 455 confirming there are no grounds for disqualification.
3. The Special Master's authority, and other provisions of the Special Master process, are set forth in the Court's Order of July 7, 2025. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED July 9, 2025. Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

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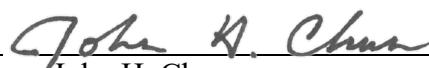
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1 IT IS SO ORDERED.
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4 July 9, 2025
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Dated



John H. Chun
United States District Judge